

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION

KAYLA J. GILES

CIVIL ACTION NO. 1:19-cv-01173

VERSUS

CHIEF JUDGE DEE D. DRELL

DELTA DEFENSE, L.L.C. and
UNITED SPECIALTY INSURANCE
COMPANY

MAGISTRATE JUDGE JOSEPH
H. L. PEREZ-MONTES

DELTA DEFENSE, LLC'S MOTION FOR SUMMARY JUDGMENT

NOW INTO COURT, through undersigned counsel, comes defendant, Delta Defense, LLC, who moves this Honorable Court to render summary judgment in its favor and against the Plaintiff. The Plaintiff's petition seeks compensation pursuant to a policy of insurance issued by United Specialty Insurance Company to Delta Defense, LLC. Plaintiff cannot present any evidence showing Delta Defense, LLC is an insurance company or has any involvement in the denial of her claim. Therefore, there are no genuine issues of material fact as to plaintiffs' claims against Delta Defense, LLC.

WHEREFORE, the Mover requests that this Honorable Court order Plaintiff to show cause why summary judgment should not be granted, dismissing Delta Defense, LLC with prejudice, and at plaintiffs' cost.

Respectfully submitted,

KOEPPEL CLARK

/s/W. Scarth Clark
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Attorneys for Delta Defense, LLC

CERTIFICATE OF SERVICE

I DO HEREBY CERTIFY that I have on this 24th day of April 2020, served the foregoing pleading on all counsel of record herein via CM/ECF filing through the United States District Court System, email, and/or United States Mail.

/s/ W. Scarth Clark
W. SCARTH CLARK

